GS.II Systemic issues are identified and remediated through the analysis of findings from information and data collected from all available sources, including monitoring, complaint investigations and hearing resolutions.

1. Baseline/Trend Data and Analysis (for reporting period July 1, 2003 through June 30, 2004):

Systemic non-compliance across SPOEs

Based on general supervision data reviews, SPOE monitoring and child complaint data, systemic issues for SPOEs include:

- 45 day timelines for initial evaluation/assessment
- Transition out of First Steps
- Application of eligibility criteria
- Notice and consent

Any noncompliance identified during the SPOE reviews are being addressed through technical assistance and follow-up monitoring reviews. Additional information can be found under the applicable clusters/indicators.

Two additional issues identified by stakeholders include:

- Provider availability, especially in very rural areas of the state
- Individualizing services through the IFSP

SPOE directors and State Interagency Coordinating Council (SICC) members, among others, have indicated that there are provider shortages in various areas of the state, especially in the very rural areas. Efforts to gather and analyze data and target provider recruitment are addressed under GS.IV.

Also from various stakeholders, there is a perception that services on IFSPs are not always individualized for infants and toddlers with disabilities. In response to this concern, the DESE has engaged in the following activities:

- Review child and financial data to determine possible service, frequency or delivery trends across SPOEs, Service Coordinators or providers/provider agencies
- Investigate data trends that raise questions at the local and regional levels by the First Steps Consultants
- Address instances where First Steps Consultants find discrepancies of practice, process, or philosophic understanding through whole-site technical
 assistance, meaning that all parties (administrators, practitioners, etc.) attend the technical assistance training
- Submit reports detailing discrepancies found and the remediation applied to DESE Compliance and Effective Practices sections

2. Targets (for reporting period July 1, 2003 through June 30, 2004):

Systemic issues are identified and remediated.

3. Explanation of Progress or Slippage (for reporting period July 1, 2003 through June 30, 2004):

The new RFP for Phase 1 SPOEs addresses the oversight and monitoring of service coordinators and providers and proposed legislative changes may improve provider and system oversight by making the SPOEs even more responsible for service provision. First Steps consultants are providing consistent technical assistance and training to SPOEs, service coordinators and providers and are assisting with provider recruitment and retention.

4. Projected Targets:

- Systemic issues are identified and remediated.
- Additional projected targets are in the Future Activities tables.

5 & 6. Future Activities to Achieve Projected Targets/Results and Projected Timelines and Resources:

See also GS.I, CE.I and CE.II

New Cluster/ Probe	Future Activities to Achieve Projected Targets (5)	Projected Targets/ Evidence of Change (4)	Projected Timelines (6)	Resources (6)
GS.II	Develop web-based compliance monitoring system for First Steps to compile monitoring results, timelines and status	Web-based compliance monitoring system developed for First Steps	2005-06	Comp, Data
GS.II	Develop webSPOE which will aid in identifying and ensuring correction of systemic issues	webSPOE data is used to identify and remediate non-compliance	2004-05	Comp, Data